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12/16/2021

Document Electronically Filed
Honorable Andrew L. Carter Jr.
United States Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007-1312

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Re: *Regan v. Commissioner of Social Security*
Docket No: 1:21-cv-03534

MEMO ENDORSED

To: Judge Carter

This letter respectfully requests an extension of time of 30 Days for Plaintiff to file their motion for Judgment on the Pleadings in this matter. Plaintiff's Brief is currently due on December 21, 2021; however, Plaintiff cannot complete the Brief on time.

The Defendant was unable to produce CARs during the early stage of the pandemic. Now the Defendant is producing 700 CARs a week and has served over a years' worth of transcripts in a very short period of time. As a result, Plaintiff's counsel has multiple simultaneous filing deadlines that cannot be met.

Plaintiff's counsel has contacted defense counsel who kindly consents to this request. This would be a second request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on January 20, 2022. The Commissioner's response would be due March 21, 2022. Plaintiff's reply, if any, would be due April 4, 2022.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Counsel for Plaintiff

CC [via ECF]: Jason Peck, Counsel for Defendant

SO ORDERED.

Dated: 12/17/2021

Honorable Andrew L. Carter Jr.
U.S. District Judge